## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

ROBERT P. 0	GOODRICH,	)
	Petitioner,	)
	v.	) Civil Action No. 03-12541-NG
TIM HALL,		)
	Respondent.	) ) _)

## PETITIONER'S MOTION FOR ENLARGEMENT OF TIME TO FILE REPLY MEMORANDUM IN SUPPORT OF ISSUANCE OF WRIT OF HABEAS CORPUS (ASSENTED-TO)

Petitioner Robert P. Goodrich ("Petitioner") hereby moves that the Court enlarge the time for filing his Reply Memorandum in Further Support of Issuance of Writ of Habeas Corpus for an additional eight days, to and including Friday, October 8, 2004. As grounds therefor, Petitioner states that the Commonwealth's opposition raises complex issues of law and presents numerous defenses to Petitioner's Petition. Petitioner, who presently seeks relief from a minimum ten-year sentence, requests that this Court provide him with additional time to comprehensively research his arguments in his Reply Memorandum. In further support of his motion, the Commonwealth has assented to the requested enlargement of time.

Respectfully submitted,

ROBERT P. GOODRICH, By his attorneys,

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Dated: September 29, 2004

## **LOCAL RULE 7.1 CERTIFICATION**

I hereby certify that on September 28, 2004, I did confer in good faith, via telephone, with Maura D. McLaughlin, Esq., counsel for Respondent, in an effort to narrow or resolve the issues raised in this motion, and counsel for Respondent has indicated that she assents to this motion.

Iill L. Brenner